

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In re

ALDRICH PUMP LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-30608 (JCW)

(Jointly Administered)

DECLARATION OF ORDINARY COURSE PROFESSIONAL

RICHARDS, LAYTON & FINGER PA

The undersigned hereby declares, under penalty of perjury, as follows:

1. I am a director of the following firm (the "Firm"), which maintains offices at the address and phone number listed below:

Firm: Richards, Layton & Finger PA

Address and Telephone Number:

One Rodney Square

920 North King Street

Wilmington, DE 19801

Tel: (302) 651-7700

Fax: (302) 651-7701

2. This Declaration is submitted in connection with an order of the United States Bankruptcy Court for the Western District of North Carolina authorizing Aldrich Pump LLC and Murray Boiler LLC (together, the "Debtors") to retain certain professionals in the ordinary course of business during the pendency of the Debtors' chapter 11 cases [Dkt. 170]

¹ The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors' address is 800-E Beaty Street, Davidson, North Carolina 28036.

(the "Order"). Following the date that the Debtors' chapter 11 cases were commenced (the "Petition Date"), the Debtors have requested that the Firm provide professional services to the Debtors, and the Firm has agreed to provide such services. Accordingly, the Firm is filing this Declaration pursuant to the Order.

3. The Firm, through me, and another director, Kelly E. Farnan, plan to provide the following services to the Debtors: representation of the Debtors in Delaware (principally in the United States District Court for the District of Delaware) in connection with Debtors' efforts to serve subpoenas on certain asbestos trusts and thereby obtain discovery.

4. To the best of my knowledge, information, and belief, formed after due inquiry, the Firm does not represent or hold an interest adverse to the Debtors or their estates with respect to the matter(s) on which the Firm is to be retained and employed.

5. The Firm believes that it is not owed money from Debtors on account of services rendered and expenses incurred prior to the Petition Date in connection with the Firm's employment by the Debtors.

6. The Firm further states that it has not shared, has not agreed to share, nor will agree to share, any compensation received in connection with these chapter 11 cases with any party or person, although such compensation may be shared with any member or partner of, or any person employed by, the Firm.

7. If, at any time during its employment by the Debtors, the Firm discovers any facts bearing on the matters described herein, the Firm will supplement the information contained in this Declaration.

Dated: July 11, 2022

By: /s/ Kevin Gross
Kevin Gross